

Rick Hernandez
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Attorney for Gabriela Vasquez Mendoza

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GABRIELA VASQUEZ MENDOZA,

Defendant.

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No. 4:15-CR-6049-EFS-7

**MOTION AND DECLARATION
TO CONTINUE
SENTENCING**

Without Oral Argument
Monday May 21, 2018 @6:30pm

COMES NOW the Defendant, Gabriela Vasquez Mendoza, by and through her attorney of record, Ricardo Hernandez, and moves this court for an order continuing the sentencing date in the above matter.

This motion is based upon the court file in the instant case, and the accompanying declaration of counsel.

DATED this 18th day of May 2018.

s/ Ricardo Hernandez

Ricardo Hernandez
Washington State bar #21463
Attorney for Gabriela Vasquez Mendoza
Hernandez Law Office, LLC
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Sunnyside, WA 98944

MOTION TO
CONTINUE
SENTENCING

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DECLARATION

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

States as follows:

1. I am the attorney of record for the defendant Gabriela Vasquez Mendoza in the above matter.
2. The Sentencing date in this matter is set for Tuesday, June 12, 2018 @ 2:00pm.
3. The defendant was recently diagnosed with a very serious illness. The defendant had surgery last month.
4. Defense counsel has provided the government with a medical document signed by the defendant's doctor confirming the details of the defendant's medical issues.
5. For this reason we are requesting that sentencing on this matter be continued for 90 days.
6. Defense counsel is also requesting new deadlines for filing objections to PSIR and Sentencing Memorandum.
7. The government has no objection to continue sentencing for 90 days.

I hereby certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 18th day of May 2018

s/ Ricardo Hernandez
Ricardo Hernandez
Washington State bar #21463
Attorney for Gabriela Vasquez Mendoza
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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2018 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Stephanie Van Marter, Assistant U.S. Attorney.

s/ Ricardo Hernandez

Ricardo Hernandez

Washington State bar #21463

Attorney for Gabriela Vasquez Mendoza

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